

EXHIBIT 15

(Redacted)

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

BING GUAN, GO NAKAMURA, MARK
ABRAMSON, KITRA CAHANA, and ARIANA
DREHSLER,

Plaintiffs,

v.

No. 1:19-CV-6570 (PKC/MMH)

ALEJANDRO MAYORKAS, Secretary of the U.S.
Department of Homeland Security, in his official
capacity; CHRISTOPHER MAGNUS, Commissioner
of U.S. Customs and Border Protection, in his official
capacity; and TAE JOHNSON, Acting Director of
U.S. Immigration and Customs Enforcement, in his
official capacity,

Defendants.

PLAINTIFFS' FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Bing
Guan, Go Nakamura, Mark Abramson, Kitra Cahana, and Ariana Drehsler (“Plaintiffs”) serve
this First Set of Interrogatories (“Interrogatories”) on Defendants Alejandro Mayorkas,
Christopher Magnus, and Tae Johnson (“Defendants”).¹ Plaintiffs request that, within thirty (30)
days of service of these Interrogatories, Defendants respond fully to the Interrogatories listed in
Schedule A, attached, pursuant to the Definitions and Instructions set forth in Schedule B,
attached, in writing and under oath, at the offices of Covington & Burling LLP, The New York

¹ Christopher Magnus became Commissioner of U.S. Customs and Border Protection on December 13, 2021, and is substituted for Troy Miller as Defendant, in his official capacity, in this action pursuant to Federal Rule of Civil Procedure 25(d).

Times Building, 620 Eighth Avenue, New York, NY, 10018, or at such other time and place as may be mutually agreed by the parties.

Dated: April 20, 2022
New York, New York

By: Esha Bhandari
Esha Bhandari

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Counsel for Plaintiffs

SCHEDULE A
INTERROGATORIES

INTERROGATORY NO. 1

Identify all instances since 2018 in which any Defendant, including any of Defendants' agents, officers, or officials, has communicated with a government official of a foreign country about any Plaintiff, including but not limited to for the purpose of: sharing information concerning any Plaintiff; requesting that the foreign official place a message, alert, flag, lookout, or notice on any Plaintiff's passport or travel and entry documentation; selecting any Plaintiff for additional questioning; or denying any Plaintiff entry into a foreign country. For each instance identified, provide: (a) the date of the communication; (b) the Plaintiff(s) at issue; and (c) the identities and nationalities of the persons who were parties to the communication.

INTERROGATORY NO. 2

For each instance alleged in the Complaint during which any Plaintiff was stopped or questioned by Defendants, state all bases Defendants had for initiating or continuing such stop or questioning.

INTERROGATORY NO. 3

State every question that Defendants asked each Plaintiff at each secondary inspection of any Plaintiff since 2018, and describe the responses thereto.

INTERROGATORY NO. 4

For each instance alleged in the Complaint during which any Plaintiff was stopped or questioned by Defendants, identify the agents, officers, or officials who participated in, were present at, or supervised any person in connection with such stop or questioning, including during both primary and secondary inspection.

INTERROGATORY NO. 5

Identify all documents, including communications, generated or once possessed by Defendants (including by their agents, officers, or officials) since 2018, concerning any Plaintiff or Operation Secure Line that have (i) become inaccessible to Defendants or (ii) ceased to exist as of the date of these Interrogatories. For each document, provide: (a) when the document became inaccessible or ceased to exist; (b) any efforts made to retrieve the document; and (c) why the document became inaccessible or ceased to exist.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

BING GUAN, GO NAKAMURA, MARK
ABRAMSON, KITRA CAHANA, and ARIANA
DREHSLER,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of the U.S.
Department of Homeland Security, in his official
capacity; TROY MILLER, Commissioner of U.S.
Customs and Border Protection, in his official
capacity; and TAE JOHNSON, Acting Director of
U.S. Immigration and Customs Enforcement, in his
official capacity,

Defendants.

No. 1:19-CV-6570 (PKC/MMH)

PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANT CBP

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Bing Guan, Go Nakamura, Mark Abramson, Kitra Cahana, and Ariana Drehsler (“Plaintiffs”) serve this Second Set of Interrogatories (“Interrogatories”) on Defendant Troy Miller¹ (“Defendant”). Plaintiffs request that, within thirty (30) days of service of these Interrogatories, Defendant respond fully to the Interrogatories listed in Schedule A, attached, pursuant to the Definitions and Instructions set forth in Schedule B, attached, in writing and under oath, at the offices of Covington & Burling LLP, The New York Times Building, 620 Eighth Avenue, New York, NY, 10018, or at such other time and place as may be mutually agreed by the parties.

¹ Troy Miller has succeeded Commissioner Chris Magnus and is automatically substituted as defendant pursuant to Federal Rule of Civil Procedure 25(d).

Dated: January 23, 2023
New York, New York

By: /s/ Scarlet Kim
Scarlet Kim

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Counsel for Plaintiffs

SCHEDULE A
INTERROGATORIES

CBP INTERROGATORY NO. 6

State the earliest date that Defendant anticipated any litigation by any person or entity concerning the OSL Targeting List.

CBP INTERROGATORY NO. 7

Describe the steps that Defendant took to determine whether any of the custodians who Defendant has identified as potentially possessing materials relevant to this Lawsuit, including the Disclosed Custodians, possesses potentially relevant documents or communications existing on government-issued mobile electronic devices, on personal electronic devices, in personal files, in Messaging Apps, or in a Non-Official Electronic Messaging Account (regardless of whether the Messaging App or Non-Official Electronic Messaging Account was accessed on a government-issued or personal electronic device). This Interrogatory applies to documents and communications created or sent from November 1, 2018, to the date of this Interrogatory.

CBP INTERROGATORY NO. 8

As to each of the Disclosed Custodians, state: (1) whether the custodian has represented to Defendant that he or she does not possess, as of the date the statement was made, any documents or communications that are potentially relevant to this Lawsuit existing on government-issued mobile electronic devices, on personal electronic devices, in personal files, in Messaging Apps, or in any Non-Official Electronic Messaging Account; and (2) the date that the representation was made.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BING GUAN, GO NAKAMURA, MARK ABRAMSON,
KITRA CAHANA, ARIANA DREHSLER,

Plaintiffs,

v.

Civil Action
No. 19-CV-6570

ALEJANDRO MAYORKAS, Secretary of the U.S.
Department of Homeland Security, in his official capacity;
TROY MILLER,¹ Acting Commissioner of the U.S. Customs
and Border Protection, in his official capacity; TAE
JOHNSON, Acting Director of the U.S. Immigration and
Customs Enforcement, in his official capacity,

(Chen, J.)
(Henry, M.J.)

Defendants.

-----X

**DEFENDANTS' AMENDED AND SUPPLEMENTAL RESPONSES AND OBJECTIONS
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Defendants Alejandro Mayorkas, Secretary of the U.S. Department of Homeland Security (“DHS”), in his official capacity; Troy Miller, Acting Commissioner of the U.S. Customs and Border Protection (“CBP”), in his official capacity; and Tae Johnson, Acting Director of the U.S. Immigration and Customs Enforcement (“ICE”), in his official capacity (collectively, “Defendants”), by their attorney, Breon Peace, United States Attorney for the Eastern District of New York, Ekta R. Dharia, Assistant United States Attorney, of counsel, hereby submit, upon information and belief, their amended and supplemental responses to Plaintiffs’ First Set of Interrogatories (“Interrogatories”), dated April 20, 2022, as follows.

¹ Troy Miller has succeeded Commissioner Chris Magnus and is automatically substituted as defendant pursuant to Fed. R. Civ. P. 25(d).

To: **By E-Mail**

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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and Border Protection, in his official capacity; TAE
JOHNSON, Acting Director of the U.S. Immigration and
Customs Enforcement, in his official capacity,

(Chen, J.)
(Henry, M.J.)

Defendants.

-----X

**DEFENDANT TROY MILLER'S RESPONSES AND OBJECTIONS TO
PLAINTIFFS' SECOND SET OF INTERROGATORIES**

Defendant Troy Miller, Acting Commissioner of the U.S. Customs and Border Protection (“CBP”), in his official capacity (“Defendant”), by his attorney, Breon Peace, United States Attorney for the Eastern District of New York, Ekta R. Dharia, Assistant United States Attorney, of counsel, hereby submits, upon information and belief, his responses and objections to Plaintiffs’ Second Set of Interrogatories to Defendant CBP (“Plaintiffs’ Second Interrogatories”), dated January 23, 2023, as follows.

RESERVATION OF RIGHTS

Defendant expressly reserves the right to supplement, clarify, revise, or correct any or all of the responses herein at any time. By making the following responses to Plaintiffs’ Second Interrogatories, Defendant does not waive, and hereby expressly reserves, his rights to assert any

To: **By E-Mail**

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